

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

LYNN HENDERSON, KRISTINA  
KULON, B. DAVID MORBY, JASON  
ROBINSON, KEVIN MORRIS, and  
JOHN LEET, individually and on behalf  
of others similarly situated,

Plaintiffs,

vs.

VOLVO CARS OF NORTH AMERICA,  
LLC, and VOLVO CAR  
CORPORATION,

Defendants.

No. 2:09-cv-04146-CCC-JAD

**CLASS ACTION**

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY  
APPROVAL OF THE CLASS ACTION SETTLEMENT**

For the reasons set forth in the accompanying Memorandum of Law submitted herewith, Plaintiffs respectfully request that this Court enter an Order: (1) conditionally certifying a class action with respect to the claims against Defendants pursuant to Fed. R. Civ. P. 23(a) and 23(b)(3) for the purpose of effectuating a class action settlement of the claims against the Defendants; (2) preliminarily approving the Settlement; (3) directing notice to class members consistent with the Notice Plan in the Settlement; and (4) scheduling a Final Approval Hearing.

Dated: April 3, 2012

By: //s// Joseph G. Sauder  
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Proposed Class***